

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND (\_\_\_\_\_)**

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RADHIKA S. MAHESH,  
Plaintiff,

CASE NO.

vs.

MR. JAMES M. PECK, CEO  
AND PRESIDENT AT TRANSUNION,  
Defendant.

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**DEFENDANT JAMES M. PECK'S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Mr. James M. Peck, CEO and President at Transunion ("Mr. Peck") hereby removes the subject action from the District Court for St. Mary's County, Maryland, to the United States District Court for the District of Maryland, on the following grounds:

1. Plaintiff Radhika S. Mahesh served Mr. Peck on or about October 25, 2018 with a Notice Of Summons and Complaint/Application And Affidavit In Support Of Judgment (the "Complaint") filed in the District Court for St. Mary's County, Maryland. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**, respectively. No other process, pleadings or orders have been served on Mr. Peck.

2. Mr. Peck is the President and Chief Executive Officer of Trans Union, LLC ("Trans Union"). Plaintiff is a "consumer" and Trans Union is a "consumer reporting agency" as those terms are defined by the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). Plaintiff alleges that "I've SENT THREE LETTER [sic] TO THE CREDIT AGENCY STILL [sic] I've attach [sic] letter regarding this reporting on my credit files [sic]. Requested [sic] and demand that they provide documents

showing proff [sic] that this is my account and correct, which was never done. PLEASE NOTE THAT THREE LETTERS WAS [sic] SENT AND STILL [sic] ON MY REPORT THAT IS CAUSING ME HIGH INTREST [sic].” See Complaint. These claims and allegations implicate the FCRA. See FCRA §§ 1681e(b) and 1681i.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the District Court for St. Mary’s County, Maryland, to the United States District Court for the District of Maryland.

5. No other Defendants are named in Plaintiff’s Complaint.

6. Notice of this removal will promptly be filed with the District Court for St. Mary’s County, Maryland and served upon all adverse parties.

WHEREFORE, Defendant Peck, by counsel, removes the subject action from the District Court for St. Mary’s County, Maryland to this United States District Court, District of Maryland.

Respectfully submitted,

/s/ Robert J. Schuckit

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*Counsel for Defendant Mr. James M. Peck  
CEO and President at Transunion*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **20<sup>th</sup> day of November, 2018**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **20<sup>th</sup> day of November, 2018**, properly addressed as follows:

<b><u>Pro Se Plaintiff</u></b> Radhika S. Mahesh 45601 Catalina Lane California, MD 20619	
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*/s/ Robert J. Schuckit*

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*Counsel for Defendant Mr. James M. Peck  
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